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8 **Attorneys for Plaintiff**
9 **Modesta Manglona Nadar**

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11 **IN THE UNITED STATES DISTRICT COURT**
12 **FOR THE NORTHERN MARIANA ISLANDS**

13 **MODESTA MANGLONA NADAR,**) **CIVIL CASE NO. 07-0024**
14 **Plaintiff,**)
15 **vs.**)
16 **NAINA ENTERPRISES (CNMI) INC. dba**) **PLAINTIFF'S PRE-DISCOVERY**
17 **ALSON'S STORE,**) **DISCLOSURE STATEMENT**
18 **Defendant.**)
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17 COMES NOW, Plaintiff, by and through counsel, and hereby submits the following
18 predisclosure disclosures pursuant to Federal Rule of Civil Procedure 26(A)(1) and Local Rule
19 16.2 CJ (d).

21 A. Persons With Potentially Discoverable Information

23 Modesta Manglona Nadar: Plaintiff. She has information as to the facts as alleged in
24 the Complaint. She can be contacted via the offices of Plaintiff's counsel.

26 Ponnu Nadar: Plaintiff's Husband. He has information as to the facts as alleged in the
27 Complaint. He can be contacted via the offices of Plaintiff's counsel.

Alson's store attendant: May have information as to the July 7, 2005 incident.

B. Description of Relevant Document

--photographs of Alson's store

--medical records of Plaintiff

--any documents identified by Defendant in response to discovery requests

C. Damages Claimed By Plaintiff

Plaintiff claims damages for personal injury to include past and future medical expenses, past and future impairment of the ability to enjoy life, mental anguish, physical suffering, statutory damages and, where appropriate, pre-judgment interest. In addition, Plaintiff prays for an injunction enjoining Defendant from its acts of discrimination under Title 3 of the ADA, and compliance with the ADA. Plaintiff claims attorney fees and costs in this litigation.

Dated: November 14, 2007.

SMITH & WILLIAMS
Attorneys for Plaintiff Modesta M. Nadar

By: _____/s/

Eric S. Smith

3332-01-071108-PL-PreDiscoveryDisclosureStatement